

IN THE COURT OF COMMON PLEAS OF MCKEAN COUNTY, PENNSYLVANIA

FREDERICK W. ERNST AND VIRGINIA R.
ERNST,

Plaintiffs,

v.

LORRAINE D. DONAHOE AND US XPRESS
LEASING, INC.,

Defendants.

CIVIL DIVISION

No. 25 CD 2022

**NOTICE OF REMOVAL OF ACTION TO
FEDERAL COURT**

Filed on behalf of DEFENDANT US XPRESS
LEASING, INC.

Counsel of record for this party:
Edward M. Vavro, Jr., Esquire
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JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF MCKEAN COUNTY, PENNSYLVANIA

FREDERICK W. ERNST AND VIRGINIA R.
ERNST,

CIVIL DIVISION

No. 25 CD 2022

Plaintiffs,

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LORRAINE D. DONAHOE AND US XPRESS
LEASING, INC.,

Defendants.

NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT

PLEASE TAKE NOTICE that on the 14th day of February, 2022, the undersigned attorney for Defendant US Xpress Leasing, Inc., filed a verified Notice of Removal of this action from the Court of Common Pleas of McKean County, Pennsylvania, to the United States District Court of the Western District of Pennsylvania. A true and correct copy of said Notice of Removal, which has been filed with the United States District Court for the Western District of Pennsylvania, is attached hereto and made a part hereof.

Please take further notice that pursuant to 28 U.S.C. § 1332, the filing of the Notice of Removal in the United States District Court for the Western District of Pennsylvania, and the filing of this Notice, effectuates the removal of this action and the above-captioned court may proceed no further unless and until the case is remanded.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By:

Edward M. Vavro, Jr., Esquire
Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402
Counsel for Defendant US Xpress Leasing,
Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and copy of the foregoing Notice of Removal of Action to Federal Court was served this 14th day of February, 2022, by electronic delivery upon the following:

Robert B. Elion, Esquire
125 East Third Street
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By Regular U.S. Mail:
Lorraine D. Donahoe
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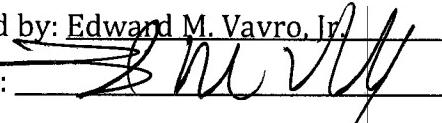
Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By: Edward M. Vavro, Jr., Esquire
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Two PPG Place
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Counsel for Defendant US Xpress Leasing, Inc.

CERTIFICATE OF COMPLIANCE

"I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents."

Submitted by: Edward M. Vavro, Jr.
Signature: 
Name: Edward M. Vavro, Jr.
Attorney No. (if applicable): 80401

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